

EXHIBIT 1

Cirino, Robert A.

From: Cirino, Robert A.
Sent: Thursday, December 05, 2013 3:53 PM
To: Christopher L. Van De Water (CLV@employmentlawyernewyork.com)
Cc: Pauta, George B. (GPauta@littler.com); Smith, Erin W.
Subject: FW: Apple-Metro litigation

Christopher,

Needless to say, we were quite surprised by Daniela's email advising us that yesterday was her last day at the firm. Despite speaking with Daniela on no less than a weekly basis, she failed to tell us at any point of her impending departure or that the promises she made in terms of supplementing Plaintiff's discovery responses would go unfulfilled. While we understand that you may need time to get up to speed in this matter, these supplemental responses are long overdue and are necessary for the Defendants' defense in this matter. Can you please confirm as soon as possible when you intend to produce these responses.

We look forward to working with you on this and the *Marin* matter in the future.

Regards,

Bob

From: Daniela Nanau [mailto:danielananau@gmail.com]
Sent: Wednesday, December 04, 2013 1:23 PM
To: Cirino, Robert A.
Cc: Pauta, George B.; Smith, Erin W.; Ari Graff; Christopher L. Van De Water
Subject: Apple-Metro litigation

Dear Bob,

Today is my last day at Borrelli & Associates. The person replacing me on the Apple Metro litigation is Christopher Van De Water, who is cc'd to this email.

In light of my departure, we require some additional time to provide you the supplementary discovery responses we discussed in the email below on the Dove matter.

Additionally, Chris will be in touch with you under separate cover about outstanding *Marin v. Applemetro* discovery issues.

Chris' contact information is below:

Christopher L. Van De Water, Esq.
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Thank you.

Daniela

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Begin forwarded message:

From: Daniela Nanau <den@employmentlawyernewyork.com>
Subject: Re: Dove v. Apple-Metro, Inc. et al
Date: November 26, 2013 at 2:14:03 PM EST
To: "Cirino, Robert A." <RCirino@littler.com>
Cc: "Pauta, George B." <GPauta@littler.com>, "Smith, Erin W." <ewsmith@littler.com>

Hi Bob,

I am not in a position to provide you with updated Dove responses but will get that information to you by December 4.

Thank you for your understanding.

Daniela

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On Nov 26, 2013, at 12:14 PM, Cirino, Robert A. <RCirino@littler.com> wrote:

Daniela,

We were expecting your updated responses and damages calculation yesterday. Please let us know when you intend to provide this information.

Regards,

Bob

From: Daniela E. Nanau [<mailto:DEN@employmentlawyernewyork.com>]
Sent: Wednesday, November 13, 2013 10:42 AM
To: Cirino, Robert A.
Cc: Pauta, George B.; Smith, Erin W.
Subject: Re: Dove v. Apple-Metro, Inc. et al

Bob,

Plaintiff will be updating her discovery responses and provide an initial calculation of damages. I hope to provide you with that information by November 25, 2013.

Attached is the executed Confidentiality Stipulation. I have made no changes and can file this via ECF today if you like. Please let me know when I can expect the remainder of the Defendants' document production.

Additionally, I have not yet received a letter from Defendants regarding e-discovery, which you produced in the Marin case. When can I expect to receive it?

Thank you.

Daniela

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